

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

GIGI CROSS PITTS

17 - 03990 - EE

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW Trustee, Harold J. Barkley, Jr., and files this his Objection to Confirmation of the Debtor's Chapter 13 Plan; and in support thereof would most respectfully show unto this Honorable Court as follows:

1. The Debtor filed a Chapter 13 Petition on October 26, 2017 and a 341(a) Meeting of Creditors was held on November 21, 2017.
2. Upon information and belief, this plan has not been filed in good faith.
3. That, the Debtor proposes to treat her student loans as "none". That, the Debtor lists Sallie Mae and Navient in her schedules but failed to provide treatment of said student loans on her plan. That, the Debtor should be required to amend her plan to provide proper treatment of all student loans.
4. That, the Debtor's Schedule "J" lists negative \$1,194.24 available for her plan payment. Should this Court confirm her plan, a strict 60 day payment compliance provision should be put in place.
5. That, confirmation should be denied and this case dismissed.
6. The Trustee hereby objects to any amended plan filed hereafter.
7. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Objection be received and filed and at a hearing hereon confirmation be denied and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: November 27, 2017

Respectfully submitted,

/S/HAROLD J. BARKLEY, JR.

HAROLD J. BARKLEY, JR. - MSB #2008
CHAPTER 13 TRUSTEE
POST OFFICE BOX 4476
JACKSON, MS 39296-4476
PHONE: 601/362-6161
FAX: 601/362-8826
EMAIL: HJB@HBARKLEY13.COM

CERTIFICATE

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U. S. Trustee
Ustpreion05.ja.ecf@usdoj.gov

Hon. William R. Armstrong, Jr.
warmstrong@wrapa.comcastbiz.net

Gigi Cross Pitts
Post Office Box 283
Sandhill, MS 39161-0283

Sallie Mae
Post Office Box 8459
Philadelphia, PA 19101-8459

Department of Education
Navient
Post Office Box 9635
Wilkes Barre, PA 18773

Office of the US Attorney
501 E Court St. #4.430
Jackson, MS 39201

Dated: November 27 2017

/S/HAROLD J. BARKLEY, JR.
HAROLD J. BARKLEY, JR.